

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ENOVSYS LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.,
VERIZON BUSINESS NETWORK
SERVICES, INC., VERIZON ENTERPRISE
SOLUTIONS, LLC, CELLCO
PARTNERSHIP D/B/A VERIZON
WIRELESS, INC., VERIZON DATA
SERVICES LLC, VERIZON BUSINESS
GLOBAL, LLC, and VERIZON SERVICES
CORP.,

Defendants.

Case No. 2:21-cv-00315-JRG-RSP

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL DEFENDANTS’
PARTIAL MOTION TO DISMISS PLAINTIFF’S CLAIMS OF INDIRECT AND
WILLFUL INFRINGEMENT**

Defendants Verizon Communications Inc., Verizon Business Network Services, Inc., Cellco Partnership d/b/a Verizon Wireless, Verizon Data Services LLC, Verizon Business Global LLC, and Verizon Services Corp. (collectively “Defendants”) file this unopposed motion to file their Partial Motion to Dismiss Plaintiff’s Claims of Indirect and Willful Infringement under seal.

Defendants’ motion discusses Exhibits G and H to the complaint, which Plaintiff has designated confidential and filed under seal pursuant to a prior order of this Court (Dkt. 21). As there is not yet a Protective Order entered in this matter to allow for under seal filings, Defendants respectfully file this motion for leave to do so. Plaintiff does not oppose the relief sought in this motion.

A proposed Order granting this unopposed motion is attached for the Court’s convenience.

Dated: November 4, 2021

Respectfully submitted,

By: /s/ Geoffrey M. Godfrey, with permission by
Michael E. Jones

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Counsel for Defendants

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendants has complied with the meet and confer requirement in Local Rule CV-7(h). This motion is unopposed.

/s/ Michael E. Jones
Michael E. Jones